



MEMO ENDORSED

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**THE CITY OF NEW YORK
LAW DEPARTMENT**

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February 1, 2006

BY FACSIMILE

The Honorable James C. Francis IV
United States Magistrate Judge, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1960
New York, New York 10007-1312

USDC SDNY
DOCUMENT
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DATE FILED: 2/1/06

Re: Adams v. City of New York, et al. 05 CV 9484 (KMK)(JCF)

Dear Judge Francis:

I am Special Assistant Corporation Counsel with the City of New York and I write in connection with the above captioned case, arising from arrests made during the Republican National Convention. We represent Defendant City of New York ("Defendant") in this matter.

Upon information and belief, individual defendants Joseph Lamendola, Jeremiah Malone, Remy Randall and Daniel Ryan are members of the NYPD and have not been served. Plaintiffs have indicated they are currently endeavoring to serve these individual defendants. Defendants would like to avoid submitting piecemeal responses to the Complaint and instead provide one uniform response on behalf of all named defendants. Plaintiffs' counsel, Michael L. Spiegel, Esq., has consented to an extension of time up to March 10, 2006. In the interim, all parties have agreed that discovery may proceed.

For the foregoing reasons, Defendant requests an enlargement of time in which all named defendants have to answer or otherwise move with respect to the Complaint up to March 6, 2006. If this meets with your approval, would you kindly "so order" it? 11

Very truly yours,

Jeffrey A. Dougherty
Jeffrey A. Dougherty

cc: Michael L. Spiegel, Esq. (by Facsimile)

2/1/06
Application granted.
SO ORDERED.
James C. Francis IV
USMJ